

IN THE FEDERAL DISTRICT COURT OF THE NORTHERN DISTRICT OF OHIO

In the matter of;

KATHY COLEMAN
Mailing address of
3901 Silsby Road
University Heights, Ohio 44118

Plaintiff

) CASE NO.

JUDGE

16 MAY 20 PM 3:53
U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
1:16 CV 1229

COMPLAINT

JUDGE GAUGHAN

MAG. JUDGE PARKER

vs.

CITY OF UNIVERSITY HEIGHTS
2300 Warrensville Center Road
University Heights Ohio
44118

) REQUEST FOR JRY DEMAN ENDORED
HEREON

and

UNIVERSITY HEIGHTS MAYOR SUSAN INFELD
2300 Warrensville Center Road
University Heights Ohio
44118

and

UNIVERSITY HEITGHTS POLICE SGT ORLIANS
2300 Warrensville Center Road
University Heights Ohio

and

UNIVERSITY HEIGHS JOHN DOES/JOHN DOE POLICE
2300 Warrensville Center Road
University Heights Ohio

and

UNIVERSITY HEIGHS BUILDING COMMISSIONER ERIC TUCK-MACALA
2300 Warrensville Center Road
University Heights Ohio

and

The Plain Dealer LLC
C/O CSC- (Lawyers Incorporating Service).
Statutory Agent
Columbus, Ohio 43218

and

The Plain Dealer Publishing Company
C/O CSC- Lawyers Incorporating Service).
Statutory Agent
50 W. Broad St. Suite 1800
Columbus, Ohio 43218

and

Northeast Ohio Media Group LLC)
C/O CSC-(Lawyers Incorporating Service).
Statutory Agent
50 W. Broad St. Suite 1800
Columbus, Ohio 43218S

and

Ryllie Danylko
1800 Superior Avenue
Cleveland, Ohio 44114

and)

WEWS NEWS STATION AT ABC
3301 Euclid Avenue
Cleveland, Ohio 44115

and

E.W. SCIPPS COMPANY
3301 Euclid Avenue
Cleveland, Ohio 44115

and

E.W. SCIPPS COMPANY
3301 Euclid Avenue
Cleveland, Ohio 44115

and)

JOHN KOSICH
3301 Euclid Avenue
Cleveland, Ohio 44115

and

JEFF HARRIS
3301 Euclid Avenue
Cleveland, Ohio 44115

Defendants

Plaintiff Kathy Coleman (hereinafter "Plaintiff" or "Coleman") sues Defendants City of University Heights, Mayor Susan Infeld, Police Sgt Orians, the Plain Dealer Publishing Company, the Plain Dealer LLC, Northeast Ohio Media Group LLC, Ryllie Danylko, WEWS News Station, E.W. Scripps Company, E.W. Scripps LLC, John Kosich, Jeff Harris and applicable John Doe police (hereinafter "Defendants"), for money damages. All individual defendants named herein are sued in both their official and personal capacities.

JURISDICTIONAL ALLEGATIONS

- 1, This is an action for money damages in excess of \$15,000
2. At all times material to the lawsuit Plaintiff Kathy Coleman was a resident of Cuyahoga County, Ohio.
3. All acts necessary or precedent to the bringing of this lawsuit occurred or accrued in Cuyahoga County, Ohio.
- 5.4. Under Ohio's Revised Code Long Arm Statute, sections 2307.381 to 2307.385, inclusive, of the Revised Code, and otherwise where applicable, this court has jurisdiction over plaintiff's state claims. It has jurisdiction over plaintiff's 1983 claims pursuant to 42 USC Section 1983.

GENERAL FACTUAL ALLEGATIONS

- 1.5. Plaintiff is a Black female, former long time public school teacher, a community activist and a 23-journalist who trained for 17-years at the Call and Post Newspaper, including coverage of alleged racism and sexism, housing discrimination school vouchers and the 2008 presidential election, and a one-on-one interview with now President Barack Obama.
- 2.6. Plaintiff is also editor in chief of Cleveland Urban News. Com of Wary Media LLC and the Kathy Wray Coleman Online News Blog.Com, Ohio's most read digital Black newspaper per Alexa.Com ranking and has published under since 2010, exposing public corruption by county and other elected

and officials, housing theft and a host of other public policy issues. She is also a community activist who leads the Imperial Women Coalition and has led televised rallies relative police murders in Cleveland and greater Cleveland violence against women in greater Cleveland by serial killers and others and a host of other matters of public concern.

3.7. On or about May 15, 2015 Coleman and two handymen were beginning repairs from a fire at her home of 19 years in University Hts, Ohio and Defendants University Heights Mayor Susan Infeld and Sgt Oriuans and others sent University Hts police onto the property without a warrant to harm and harass plaintiff in retaliation for her activism and writings and still pending 12-year litigation on her home (Cuyahoga County Case No CV03505359). Plaintiff got to safety by backing out her home driveway and touching nobody.

4.8. In retaliation and for other reasons Defendants then embarked on a massive defamation and slander campaign across the Internet at various media outlets targeting the plaintiff, including a article written by Defendant Rallie Danylko and published online by Defendant Northeast Ohio Media Group Defendant and by Plain Dealer Newspaper on May 18, 2015, and a story that ran also on May 19, 2015 at Defendant WEWS News Station 5, led by reporter John Kosich and pushed by Defendant News Director Jeff Harris. The reports were lies and said that Plaintiff Coleman was at an abandoned home she had apparently broken into and not her own home and that she had be indicted on felonious assault charges relative to University Hts police, who has be sent onto her property to harm her. Defendants Harris, Kosich and News Station 5 went further and said plaintiff had all ready been convicted of the charges, or implied it, and that she was wanted for felonies assault of the White cops that came onto her property that she did not even touch. Defendant WEWS New Station is owned by Defendant E.W. Scripps. Defendants refused to tell the truth and denied plaintiff's request for subsequent corrections and conspired to defame plaintiff for her activism, writings and pending litigation on her home. Defendant University Heights Police Sgt Orians, a lapdog for Defendant Mayor Infeld, led the defamation and made comments to the aforementioned, publicized comments designed to harm plaintiff's reputation and to harass her.

9. Defendants specifically targeted the Plaintiff as to her activism and her online business and in specific detail referred to allegations specifically designed to effect the financial status of the Plaintiff's business, Wray Media LLC

10. Plaintiff has suffered severe economic loss as a result of Defendants actions.

11 Plaintiff's reputation has been severely damaged by Defendants actions.

12 Defendants actions have caused severe emotional distress to the plaintiff and plaintiff's family

13. Defendants actions were deliberate, wanton, malicious, false and defamatory, and were pursued with deliberate disregard of the truth

COUNT ONE: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

14.14. Plaintiff re-alleges and restates the foregoing as if fully re-written herein.

15.15. The aforementioned actions of defendants constitute and have caused serous intentional infliction of emotional distress

COUNT TWO: DEFAMATION

16..16. Plaintiff re-alleges and restates the foregoing as if fully re-written herein

17..17. The aforementioned actions of defendants constitute defamation

COUNT THREE: FREE SPEECH VIOLATIONS UNDER THE 1ST AMENDMENT OF THE UNITED STATE CONSTITUTION

16/1/2016
COUNT IV
SPARSH
2/2/2017

16..18 Plaintiff re-alleges and restates the foregoing as if fully re-written herein

17..19. The aforementioned actions of defendants constitute free speech violations under the First Amendment

Wherefore Plaintiff seeks
defendants

judgment against
and compensatory
punitive damages

Plaintiff Kathy Coleman states that the aforementioned is relative to the best her knowledge and herein seeks punitive and compensatory damages where applicable in an amount to be determined at trial and against all defendants

Plaintiff Kathy Coleman hereby demands a trial by jury on all issues

Respectfully submitted,


Kathy W. Coleman

Mailing address: 3901 Silsby Road
University Heights, Ohio 44118

CERTIFICATE OF SERVICE

A copy of the foregoing was sent to Defendants by regular U.S mail, this 19th day of May, 2016.


Kathy Coleman